

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

In re Ethicon, Inc. Pelvic Repair System  
Products Liability Litigation

MDL No. 2327

-----  
This Documents Relates to all Cases  
-----

**APPLICATION OF WILLARD JAMES MOODY, JR. FOR  
APPOINTMENT TO PLAINTIFFS' STEERING COMMITTEE**

In accordance with Paragraph 19 of Pretrial Order #1, the undersigned makes this Application to the Plaintiffs' Steering Committee as follows:

I am the Vice President of The Moody Law Firm headquarted in Portsmouth, Virginia and have represented plaintiffs as a trial attorney for twenty-eight years. The Moody Law Firm is a personal injury firm handling primarily serious injury claims, FELA cases, product liability claims and Mass Torts involving pharmaceutical products and medical devices. I received my Bachelor of Arts degree from Elon College in 1979 and graduated from T.C. Williams School of Law, University of Richmond, Virginia in 1983. I am currently licensed to practice law in the States of Virginia, West Virginia, North Carolina and Florida. I have been admitted to practice before the United States District Court for the Eastern District of Virginia, United States District Court for the Western District of Virginia, U.S. Fourth Circuit Court of Appeals and United States Supreme Court. In addition to being a senior trial attorney in The Moody Law Firm, I run the Mass Tort Division of the firm which has represented over 20,000 individuals for asbestos related injuries nationwide as well as numerous other pharmaceutical products and medical devices. I am a member in good standing of the Virginia Trial Lawyers Association, the American Association of Justice, the American Bar Association and serve on the Board of Directors of the Academy of Railway Labor Attorneys. I was recently named as one of Virginia's "Super Lawyers for 2011" and also hold the highest rating available with Martindale

Hubbell's National Law Directory (AV). I co-authored the section on trying Federal Employers' Liability Act cases in the ATLA's Manual on Litigating Tort Cases.

I have many years of experience representing individuals in pharmaceutical mass torts including but not limited to cases involving Vioxx, Fosamax, Zicam, Avandia, SSRI Birth Defect Claims, Reglan/Metoclopramide, Zimmer Knee Implants, NuvaRing, Levaquin, DePuy ASR and Pinnacle hip implant claims and cases involving surgically implanted Pelvic Mesh.

I currently serve on the Plaintiffs' Discovery Committee of "*In re DePuy Orthopaedics, Inc. ASR Hip Implant Products*, MDL 2197". I also currently serve as co-counsel on the Plaintiffs' Committee in the Philadelphia Court of Common Pleas Coordinated Reglan/Metoclopramide litigation with respect to discovery matters relating to brand defendant Wyeth and its predecessor A.H. Robins and I coordinate those activities with the same litigation which is centered in Atlantic City, New Jersey in front of the Honorable Judge Carol Higbee.

The Moody Law Firm is currently investigating over a 1,500 cases that involve pelvic mesh implants and expect to be involved in many more cases in the future. We are currently representing plaintiff's whose cases are filed in MDL 2327 and expect to be filing more cases involving the defendants' subject to the jurisdiction of the MDL.

I have tried many cases to jury verdict in many jurisdictions around the country. Most of my career has been dedicated to preparing cases for trial and actually seeing them through to verdict in the courtroom. I believe my trial experience provides me with unique skills in conducting discovery and jury trials that will benefit the group of plaintiffs in this litigation as a whole. Throughout my career, I've successfully worked with judges and attorneys in multiple jurisdictions throughout the nation and have become familiar with the duties and responsibilities of counsel in complex litigation in mass torts.

I am willing and available to commit the time and resources necessary to fulfill the duties and obligations of the membership on the Plaintiffs Steering Committee. I've reviewed the Plaintiffs' Proposed Counsel Organizational Structure Plan and those individuals suggested for the Steering

Committee. I know and I have worked with many of the individuals on the Proposed Committee including being co-counsel on cases with some of the members and have the ability to work cooperatively with all included. I am willing to consistently and continually commit the time effort and resources to this litigation necessary to complete the litigation on behalf of all claimants involved.

This 30th day of March, 2012.

Respectfully submitted,

By: /s/Willard James Moody, Jr.  
Willard James Moody, Jr.  
Virginia Bar No. 22866

THE MOODY LAW FIRM, INC.  
500 Crawford Street, Suite 300  
Portsmouth, Virginia 23704  
[will@moodyrllaw.com](mailto:will@moodyrllaw.com)  
(757) 393-6020  
(757) 399-3019 (Fax)

CERTIFICATE OF SERVICE

I hereby certify that on March 30, 2012, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service to this MDL.

/s/Willard James Moody, Jr.  
Willard James Moody, Jr.  
Virginia Bar No. 22866

THE MOODY LAW FIRM, INC.  
500 Crawford Street, Suite 300  
Portsmouth, Virginia 23704  
[will@moodyrllaw.com](mailto:will@moodyrllaw.com)  
(757) 393-6020  
(757) 399-3019 (Fax)



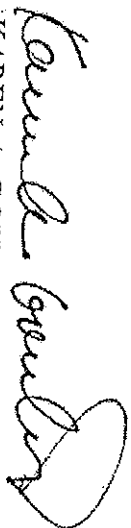
## VIRGINIA STATE BAR

### CERTIFICATE OF GOOD STANDING

THIS IS TO CERTIFY THAT WILLARD JAMES MOODY, JR. IS AN ACTIVE MEMBER OF THE VIRGINIA STATE BAR IN GOOD STANDING. MR. MOODY WAS LICENSED TO PRACTICE LAW IN VIRGINIA ON SEPTEMBER 29, 1983,

AFTER SUCCESSFULLY PASSING THE BAR EXAMINATION GIVEN BY THE VIRGINIA BOARD OF BAR EXAMINERS.

Issued March 28, 2011

  
KAREN A. GOULD  
EXECUTIVE DIRECTOR AND  
CHIEF OPERATING OFFICER